

Exhibit A

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**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

IN RE: UBER TECHNOLOGIES, INC.
PASSENGER SEXUAL ASSAULT
LITIGATION

This Document Relates to:

WHB 1486 v. Uber Technologies, Inc., et al.
Case No. 3:24-cv-04803

MDL No. 3084 CRB

**PLAINTIFF WHB 1486'S FIRST AMENDED
RESPONSES TO DEFENDANTS UBER
TECHNOLOGIES, INC., RASIER, LLC,
AND RASIER-CA, LLC'S
INTERROGATORIES, SET ONE**

**PROPOUNDING PARTIES: DEFENDANTS UBER TECHNOLOGIES, INC., RASIER,
LLC, AND RASIER-CA, LLC**

RESPONDING PARTY: PLAINTIFF WHB 1486

1 **INTERROGATORY NO. 4:**

2 For each INJURY identified in response to Interrogatory No. 3, identify every symptom, condition,
3 OR manifestation that YOU believe YOU have experienced as a result of that INJURY AND when YOU
4 first experienced each symptom, condition, OR manifestation, INCLUDING whether YOU ever
5 experienced that symptom, condition, OR manifestation before the ALLEGED INCIDENT.

6 **RESPONSE TO INTERROGATORY NO. 4:**

7 Plaintiff objects to Interrogatory No. 4 to the extent that it requires a legal conclusion and/or the
8 disclosure of information that is protected from disclosure by the attorney-client privilege and/or the
9 attorney work-product doctrine.

10 Plaintiff further objects to the extent that this Request seeks, prematurely, expert materials and/or
11 opinions, as doing so impermissibly intrudes upon her counsel's work product.

12 Plaintiff further objects that case specific discovery has just begun, and as such this request may
13 be premature.

14 Subject to and without waiving the foregoing objections, Plaintiff responds as follows:

15 Pain and suffering and mental anguish; Plaintiff was made to feel extremely uncomfortable and
16 unsafe during and after the ride, and as a result of the incident has become very distrustful of others and
17 bottled up her feelings.

18 Plaintiff has not to date been diagnosed with any mental disorder or condition by a licensed
19 healthcare provider. While Plaintiff has not to-date received any psychiatric, psychologic or mental health
20 treatment, Plaintiff reserves the right to supplement her response should that change at some point in the
21 future.

22 If Defendants believe further data is relevant and subject to production, Plaintiff is willing to confer
23 on this issue. Plaintiff reserves the right to supplement this response at a later time should she obtain or
24 recall more responsive, nonprivileged, relevant information.

25 **INTERROGATORY NO. 5:**

26 If ANY MEDICAL PRACTITIONER has advised YOU that YOU may require future OR
27 additional treatment for ANY INJURIES that YOU attribute to the ALLEGED INCIDENT, state, for each
28 INJURY: